Attorney Docket No. <u>SOM919990007US1</u>

## <u>REMARKS</u>

The present application was filed on November 22, 1999 with claims 1-27. In the outstanding Office Action dated December 3, 2002, the Examiner: (i) objected to claims 1, 2, 21, 23 and 24 due to certain informalities; (ii) objected to the declaration; (iii) rejected claim 1 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,179,639 to Taaffe (hereinafter "Taaffe"); (iv) rejected claims 1, 16 and 27 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,442,788 to Bier (hereinafter "Bier"); (v) rejected claims 20-24 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,307,561 to Doi et al. (hereinafter "Doi") in view of Bier; (vi) rejected claims 25 and 26 under 35 U.S.C. §103(a) as being patentable over Taaffe in view of Bier; and (vii) made final the restriction requirement.

In this response, Applicants: (i) traverse the objection to the Declaration; (ii) amend claims 1, 2, 21, 23 and 24; and (iii) traverse the various §102(b) and §103(a) rejections for the following reasons.

Regarding the restriction requirement, Applicants cancel the claims of Group II, namely, claims 17-19, without prejudice to pursue such claims in a divisional application.

Regarding the objection to the declaration, Applicants traverse such objection. Applicants respectfully direct the Examiner's attention to M.P.E.P. §602 which indicates the information supplied on a declaration filed after the filing date of the application that is acceptable as a minimum for identification. One of the acceptable minimum forms of information includes the attorney docket number associated with the filed specification.

Applicants assert that the declaration filed in this case meets, at least, the above requirement. Applicants point out that the docket number at the top right hand corner of the declaration (the first page of which is attached hereto) reads "SE9-99-007 (1963-7342)." This matches the docket number of the specification as originally filed, as evidenced on the transmittal papers accompanying the application filed on November 22, 1999 (the first page of which is attached hereto). In addition, the declaration sets out the correct filing date and correct inventorship. Accordingly, withdrawal of the objection is respectfully requested.

Regarding the objection to claims 1, 2, 21, 23 and 24, Applicants have corrected the various typographical informalities therein. Accordingly, withdrawal of the objection is respectfully requested.

Regarding the allowability of claims 2-15, Applicants thank the Examiner for such acknowledgment and preserve the right to rewrite such claims in independent form pending the disposition of the non-allowed claim (claim 1) from which they depend.

Regarding the rejection of claim 1 under §102(b) based on Taaffe, Applicants respectfully traverse such rejection. Claim 1 recites a method of reconciling multiple inputs to a processor, comprising the steps of: receiving a plurality of inputs at a processor; and providing an output from the processor to an interface, the output based on the plurality of inputs, wherein the output has a degraded response when more than one of the plurality of inputs is asserted simultaneously and an increased response when one of the plurality of inputs is asserted significantly more than the other inputs. While the present specification describes a user-controlled animation application that allows a user to more easily learn how to control the progression of an animation, the invention is not so limited.

On the other hand, Taaffe discloses a technique for the high resolution display of an image on a monitor or display unit of a computer system simultaneously with the lower spatial resolution display of graphics on the monitor screen (see column 1, lines 12-16, of Taaffe). By way of example, as specified at column 2, lines 21-24, of Taaffe, the technique provides for displaying, on a display unit at the same time, graphics (lower spatial resolution) overlaying an image (high resolution).

This is significantly different than what is recited in claim 1. First, Taaffe deals with a simultaneous output of two signals, namely, an image signal and a graphics overlay signal. The claimed invention recites simultaneous assertion of a plurality of inputs. Second, the section of Taaffe pointed to by the Office Action, namely, column 3, line 52, through column 4, line 16, does not teach or suggest that "the output has a degraded response when more than one of the plurality of inputs is asserted simultaneously and an increased response when one of the plurality of inputs is asserted significantly more than the other inputs," as in the claimed invention. What is described in Taaffe (for example, in Table I) is how the mixer integrates the image signal and the graphics overlay signal. There is no description of a degraded or increased response depending on when one of the plurality of inputs is asserted significantly more than the other inputs, as in the claimed invention.

For at least these reasons, Applicants request withdrawal of the §102(b) rejection of claim 1 based on Taaffe.

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Regarding the rejection of claims 1, 16 and 27 under §102(b) based on Bier, Applicants respectfully traverse such rejection.

Bier discloses a multi-user multi-device system that enables a plurality of users to control a single screen. That is, Bier allows for sharing a plurality of software applications on a single display while permitting substantially simultaneous input from all users (see column 2, lines 15-17 of Bier). The Office Action suggests that Bier discloses <u>degraded</u> or <u>increased</u> response depending on when one of the plurality of inputs is asserted significantly more than the other inputs, as in the claimed invention. However, providing for such a feature in Bier would be counterproductive to the goals that Bier is trying to attain, e.g., the ability to share a plurality of software applications on a single display. The Office Action points to FIG. 23 of Bier to support the assertion that Bier teaches a degraded response. However, at column 14, lines 67 and 68, of Bier, it is clearly stated that, but for the actions of the Bier technique (using "paint algorithms" described in column 15), such inconsistencies <u>would appear</u>, not that they <u>do appear</u>. Thus, Bier takes measures to avoid the appearance of such inconsistencies, while the claimed invention provides a degraded response and/or discouragement when more than one of the plurality of inputs is asserted simultaneously. If this feature were provided by Bier, the Bier system would be ineffective because multiple users would not want to use it.

For at least these reasons, Applicants request withdrawal of the §102(b) rejection of claims 1, 16 and 27 based on Bier.

Regarding the rejection of claims 20-24 under §103(a) based on Doi and Bier, Applicants respectfully traverse such rejection. Doi discloses animation generating techniques. However, the combination of Doi and Bier fails to teach or suggest all of the limitations of claims 20-24.

First, while Doi deals with animation, there is no disclosure of "summing the plurality of inputs, wherein the animation moves forwards when the output is positive and the animation moves backwards when the output is negative," as in the claimed invention. By merely citing that Bier reconciles multiple inputs, as in the Office Action, does not make up for the lack of teaching or suggestion of the features expressly recited (e.g., "summing . . .") in claim 20. Also, for at least the same reasons presented above regarding the deficiencies of Bier, Applicants assert that the combination of Doi and Bier fails to teach or suggest the claimed features of dependent claims 21-24.

For at least these reasons, Applicants request withdrawal of the §103(a) rejection of claims 20-24 based on Doi and Bier.

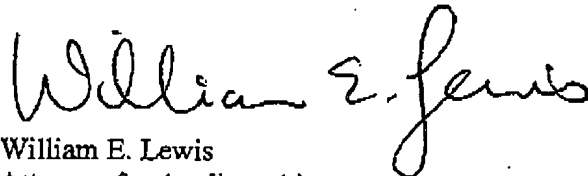Attorney Docket No. <u>SOM919990007US1</u>

Regarding the rejection of claims 25 and 26 under §103(a) based on Taaffe and Bier, Applicants respectfully traverse such rejection. The deficiencies of Taaffe and Bier have been individually set out above. However, in combination, they still fail to teach or suggest all limitations of claims 25 and 26. For instance, based on the same explanations given above, it is clear that the combination of Taaffe and Bier fail to teach or suggest a technique that "combines the inputs to form an output response and <u>degrades the output response</u> when multiple inputs are asserted simultaneously, and <u>increases the output response</u> when one input is asserted substantially more than the other inputs," as in the claimed invention.

For at least these reasons, Applicants request withdrawal of the §103(a) rejection of claims 25 and 26 based on Taaffe and Bier.

Attached hereto is a marked-up version of the changes made to the claims by the present Amendment.

In view of the above, Applicants believe that claims 1-27 are in condition for allowance, and respectfully request withdrawal of the §102(b) and §103(a) rejections.

Respectfully submitted,

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<u>VERSION WITH MARKINGS TO SHOW CHANGES MADE</u>

<u>IN THE CLAIMS</u>

Please cancel claims 17-19 without prejudice.

Please amend claims 1, 2, 21, 23 and 24 as follows:

1. (Amended) A method of reconciling multiple inputs to a processor, comprising:

receiving a plurality of inputs at a processor; <u>and</u>

providing an output from the processor to an interface, the output based on the plurality of inputs, wherein the output has a degraded response when more [then] <u>than</u> one of the plurality of inputs is asserted simultaneously and an increased response when one of the plurality of inputs is asserted significantly more than the other inputs.

2. (Amended) The method of claim 1, wherein <u>said</u> plurality of inputs are represented by an input vector in a coordinate space, and the output response is a maximum when the vector lies along a coordinate axis of the coordinate space, and the output response is a minimum when the vector lies along a diagonal in the coordinate space.

21. (Amended) The method of claim 20, wherein the output is degraded when more [then] <u>than</u> one of the plurality of inputs is asserted simultaneously and the output has an increased response when one of the plurality of inputs is asserted significantly more than the other inputs.

23. (Amended) A method of reconciling multiple inputs to control an animation, comprising:

receiving n inputs at a processor, wherein n is at least 2;

displaying an animation [n] <u>in accordance with</u> a user interface by moving through an n-dimensional grid of animation frames in a direction based on the n inputs.

24. (Amended) The method of claim 23, wherein the animation response is degraded when more than one input is asserted simultaneously, and the animation response increases when [on] <u>an</u> input is asserted substantially more than the other inputs.